

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS**

_____)	
HARRIET MENEZES,)	
)	
Plaintiff,)	
)	
v.)	Civil Case No. 04-10366JLT
)	
UNITED AIRLINES, INC., et al)	
)	
Defendants.)	
_____)	

**UNION DEFENDANTS' MOTION FOR FOR EXTENSION OF TIME IN WHICH
TO RESPOND TO MOTION TO REOPEN CASE
AND CERTIFICATION PURSUANT TO LOCAL RULE 7.2**

The Plaintiff, Harriet Menezes, has filed a Motion to Reopen this case, and a companion case, Menezes v. Association of Flight Attendants-CWA, et al, No. 04-10365 JLT. This Motion requests an extension of time until February 2, 2005 in which to respond to the Motion. As grounds therefore, the Association of Flight Attendants-CWA, AFL-CIO ("Union"), and the individual union defendants state:

1. Ms. Menezes filed these actions in February of 2004 alleging a breach of the duty of fair representation against the Union and union-affiliated individuals, and asserting various statutory claims against United Airlines.
2. On or about November 2004, after a status conference before this Court, Ms. Menezes and defendants entered into a settlement agreement. A Stipulation of Dismissal was filed with the Court on or about January 7, 2005.
3. On or about January 13, 2006, Ms. Menezes filed a Motion to Reopen her case. The Motion alleges various acts of alleged wrongdoing against United

Airlines. It does not make any claims against the Union or the union affiliated individual defendants. The Defendants' response is now due on January 23, 2006.

4. The Union is currently investigating the allegations contained in Ms. Menezes Motion, and needs additional time in which to respond.
5. United Airlines has sought an extension of time in which to respond until February 2, 2006, which has been granted by the Court.

WHEREFORE, Defendants respectfully request that they be allowed until February 2, 2006 to respond to the Motion.

Rule 7.1 Certification

The undersigned counsel certify that Attorney Gilmartin has conferred with Ms. Menezes, who opposes the Motion. Attorney Sullivan has conferred with Attorney Politis who has no objection.

Respectfully submitted,

Association of Flight Attendants-CWA,
AFL-CIO, et al

/s/ Edward J. Gilmartin
Edward J. Gilmartin
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Dated: January 20, 2006

CERTIFICATE OF SERVICE

I hereby certify that a true copy of the Motion For Extension of Time was served upon Harriett Menezes, 169 Thoreau Street, Apt. 8, Concord, MA 01742 and Brigitte Duffy and Yvette Politis, Seyfarth Shaw, World Trade Center East, Two Seaport Lane, Suite 300, Boston, MA 02210 by first class mail this 20th day of January, 2006.

/s/Mary T. Sullivan
Mary T. Sullivan